

Presentation to RFAC, Dec. 6, 2012

Dan Plummer, chairman of the board

Friends of the Upper Delaware River

I represent the Delaware Watershed Conservation Coalition, which includes close to ten conservation organizations and river stakeholders. We have several recommendations for you:

1. Lordville Thermal Relief Program

We support the addition of special-need water release protocols to protect the river's ecosystem from severe thermal stress during inevitable summer heat waves. The Lordville program is being formulated based upon a scientific study by our research partner, Dr. Peter Kolesar, professor emeritus at Columbia University. Dr. Kolesar proposes a program to maintain a maximum water temperature of 75 degrees at the Lordville gage. During 2012, thermal relief triggers would have been reached on just 14 days. This seems a very reasonable solution to a longstanding problem.

- a. During his research, Dr. Kolesar has found vast gaps in basic data on water temperatures at various points in the Delaware system. We urge you to resolve this by adding additional river gages and making readily available to the public water data collected by the Rivermaster.
- b. In a related water-flow issue, we support new protocols to cushion the impact of sudden reduced flows ("directed releases"), which can have a jarring impact on the river ecosystem. Directed releases should be ramped both up and down gradually, at rates determined by state fishery experts.

2. One-Year Revision

We ask that any change to the current flow program be limited to one year. There are many good reasons for this. First, the Croton system is scheduled to go back online in 2013, and the availability of this water will impact water needs from Delaware and Catskills systems. Second, two major river studies - by the USGS and The Nature Conservancy - are expected to be wrapped up soon. Thirdly, Hernan Quinodoz, DRBC senior engineer/hydrologist, is currently testing the Delaware River Basin version of OST to see how it performs against New York City's OST version. Results and findings from all of the above could provide crucial new data that impacts water release. In deference to this, program changes should be limited to a single year.

- a. Our coalition requests a more formalized protocol through which we can express our opinions on periodic evaluations and revisions on flow programs. To that end, we suggest the following language be considered to ensure all stakeholders' ability to revisit any new plan: *To facilitate consideration of such revisions as part of the adaptive management process, RFAC will, as part of its regular order of business, receive comments from Delaware Basin stakeholders as to any impact the releases have, or potentially will have, on the natural resources and economy.*
- b. As part of any longer-term solution, the coalition asks that consideration be given to the Equitable Apportionment Plan (EAP), previously presented to you by Garth Pettinger, which can be used as scientific basis for a rational and equitable long-term solution to water withdrawal from the Delaware.

3. Public Comment Period

- a. Prior to any new plan being implemented, the coalitions request that a public comment period be allowed.